

Anthony N. Iannarelli Jr.
Attorney at Law
74 Lafayette Avenue
Suite 202 # 116
Suffern, New York 10901
212-431-1031
anilaw2@gmail.com

April 15, 2025

Hon. Valerie Figueredo
Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, N.Y. 10007-1312

Re: Mohamed John Akhtar et al. v. Eric Adams et al.
23-cv-06585 (JGLC) (VF)

Dear Magistrate Judge Figueredo,

Please accept this letter-motion in behalf of plaintiffs' request for an extension of time to respond to defendant Eric M. Eisenberg's motion for dismissal of plaintiff's amended complaint filed on or about April 3, 2025. It is my understanding that plaintiffs' response in opposition is due on or before April 23, 2025.

Because this week is a short week, and because of other obligations, I am seeking an extension of seven (7) days. If the extension were to be granted, the new due date will be Wednesday, April 30, 2025.

I have sought in advance the position of Mr. Eisenberg regarding this request. The response I have received from Mr. Eisenberg is troubling.

In the emails exchanged regarding the extension request, on April 10, 2025, Mr. Eisenberg concludes with the directive that I not refer to him by his surname. He suggests it is indicative of "anti-Semitism." I find this disturbing and must say that I am deeply hurt by these allegations, which I deny and have no basis in fact.

Mr. Eisenberg's allegations, along with the accompanying threatening language, are increasing with intensity. By email communication of Sunday, April 13, 2025, Mr. Eisenberg referred to me as a "bigot," and alleges I am acting out of malice, hate, and anti-Jewish discrimination, that he plans on bringing the "appropriate claims" because I am "the driving force of the antisemitic targeting and lies."

Prior to this, by email communication dated March 27, 2025, Mr. Eisenberg referred to me as a "liar" and that he will "ensure that ("I") will be brought to justice."

On that occasion, along with the others, I was acting in my capacity as counsel for plaintiffs. I am attaching the email communications to this letter herein.

I have endured many months of Mr. Eisenberg personally insulting me in vile terms. My response has been always to be patient, ignore, and seek nothing more than to make a record. But with Mr. Eisenberg's escalation, in referring to me as a bigot and that he will "bring me to justice," it has grown more concerning.

I have asked Mr. Eisenberg to provide evidence to support his contentions, but he responded with additional insults. Each and every time Mr. Eisenberg has made an allegations of bias, I have investigated and not found any evidence that would support his claims.

I find it difficult to write the Court over this issue, but the allegations of bias have become emotionally taxing. I believe that I have no other choice but to make a clear record of what has transpired. Given Mr. Eisenberg's threats to take some sort of action in the future, there may come a time when I am asked why I did not bring this issue to the Court's attention at the time they were occurring? I have, but perhaps not in this detail, because I do not want this to be a distraction in moving the case forward.

Thank you for Your Honor's attention to the foregoing.

Respectfully submitted,



Anthony N. Iannarelli Jr.
Attorney for Plaintiffs

CC Via ECF

Ms. Kerri Devine, Esq.

Ms. Genan F. Zilkha

Assistant Corporation Counsels

Via Email & ECF

Mr. Eric Eisenberg, Esq.

Defendant *pro se*



Anthony Iannarelli <anilaw2@gmail.com>

Response to Opposition to Order

2 messages

Anthony Iannarelli <anilaw2@gmail.com>

Thu, Mar 27, 2025 at 3:24 PM

To: Eric Eisenberg <ericnoise@hotmail.com>, Eric Eisenberg <ericeis@gmail.com>

Sir, Please see attached. A. Iannarelli, Attorney for Plaintiffs

Anthony N. Iannarelli Jr.
Attorney at Law
201-236-1838
anilaw2@gmail.com



Ps' Response to D's Objection to Order (revised 03.27.2025).pdf
5211K

Eric Eisenberg <ericnoise@hotmail.com>

Thu, Mar 27, 2025 at 3:34 PM

To: Anthony Iannarelli <anilaw2@gmail.com>, Eric Eisenberg <ericeis@gmail.com>

You continue to be a liar, and I will ensure you are brought to justice

Get Outlook for iOS

From: Anthony Iannarelli <anilaw2@gmail.com>**Sent:** Thursday, March 27, 2025 3:24:07 PM**To:** Eric Eisenberg <ericnoise@hotmail.com>; Eric Eisenberg <ericeis@gmail.com>**Subject:** Response to Opposition to Order

[Quoted text hidden]

Ex. 1



Anthony Iannarelli <anilaw2@gmail.com>

Extension to respond to dispositive motions--Akhtar v. Addams Doc. No. 23-cv-06585

4 messages

Anthony Iannarelli <anilaw2@gmail.com>

Thu, Apr 10, 2025 at 12:35 PM

To: Eric Eisenberg <ericeis@gmail.com>, Eric Eisenberg <ericnoise@hotmail.com>

Dear Mr. Eisenberg, I need to ask for additional time to respond to your dispositive motions now before the district court. In recent weeks, I have spent a lot of time responding to many other motions in this case. I have obligations to other courts for which I need to file responses, including the possibility of being sent out to trial.

Therefore, I must ask for your consent in seeking an additional two weeks (14 days), to file responses to the motion(s) currently pending before the district court. Given the court had given you an extension to respond to plaintiffs' amended complaint, I did not anticipate you would be responding on such short notice. I attempted to plan around the due date of your anticipated response, but that is no longer possible.

I thank you in advance for your anticipated cooperation.

Thank you, Anthony Iannarelli, Attorney for Plaintiffs

—
Anthony N. Iannarelli Jr.,
Attorney at Law
201-236-1838
212-431-1031
anilaw2@gmail.com

Eric Eisenberg <ericeis@gmail.com>

Thu, Apr 10, 2025 at 12:55 PM

To: Anthony Iannarelli <anilaw2@gmail.com>

Cc: Eric Eisenberg <ericnoise@hotmail.com>

Dear Anthony,

I just sent you a reminder email about a simple matter relating to a possible April 2, 2025 email you have referenced that I never received. Can you please advise when you can provide an answer to that inquiry?

Also, it would be helpful to my consideration of your request if you could identify the specific "obligations" to which you refer in your below email, including but not limited to identification of the case that you submit may proceed to trial. Otherwise, I am operating in the dark as to the necessity of an extension.

Upon your clearing up of these matters, I anticipate there is a good chance I will be able to consent to some form of extension.

Best,
Eric

[Quoted text hidden]

Anthony Iannarelli <anilaw2@gmail.com>

Thu, Apr 10, 2025 at 3:49 PM

To: Eric Eisenberg <ericeis@gmail.com>

Mr. Eisenberg, I have no obligation to you when it comes to information concerning my clients, particularly when it may include matters in the criminal courts.

Will you consent to an extension of time for plaintiffs to respond to your dispositive motions, or will you not? Kindly just answer the question without elaboration.

Anthony Iannarelli, Esq.

Thank you. Anthony

Anthony N. Iannarelli Jr.
Attorney at Law
201-236-1838
anilaw2@gmail.com

[Quoted text hidden]

Eric Eisenberg <ericeis@gmail.com>
To: Anthony Iannarelli <anilaw2@gmail.com>

Thu, Apr 10, 2025 at 4:09 PM

Dear Anthony,

I respectfully disagree with your below assessment. You cannot in good equity use your other cases as a sword to obtain relief, and then as a shield to hide those cases. The identity of your accused criminal client is not privileged information.

I am also still waiting on your response regarding the alleged April 2, 2025 email. Did you send it to me or not, and, if so, would you be so kind as to forward it to me, as I have not received it? This is a matter of basic courtesy.

Once I have this information, I will be in a position to provide you with my position on an extension. I am generally inclined towards accommodating at least a short extension, but I can't take a position until I have the relevant information and you behave with at least a minimum of cooperation regarding prior communications in this case. You are wasting my time, and indeed 'gaslighting' me, by identifying alleged April 2, 2025 correspondence to me that I have not received and then refusing to forward it.

Best,
Eric

P.S. Please stop addressing me by my Jewish last name. I find it triggering given my understanding that you have targeted me, and not others similarly situated, based on my Jewish religion and/or ethnicity.

[Quoted text hidden]



Anthony Iannarelli <anilaw2@gmail.com>

April 10, 2025 email Communication

4 messages

Anthony Iannarelli <anilaw2@gmail.com>

Sun, Apr 13, 2025 at 1:12 PM

To: Eric Eisenberg <ericeis@gmail.com>, Eric Eisenberg <ericnoise@hotmail.com>

Dear Sir, I have reviewed your email of April 10, 2025 in which you allege you are being "targeted" because of your "religion and ethnicity." The last time you made this allegation, I asked for any evidence that would support your allegations? You failed to respond to that request.

When you made those initial allegations, I took the time to do a thorough file review that might substantiate your allegations, but could find nothing. When you again made those allegations I sought out additional witnesses. I located three (3) additional individuals that will testify having observed you engaging in misconduct, the least of which is trespass. These witnesses have asserted they observed you on several occasions trespassing on Swing 46 property and placing, what appeared to be a cell phone, directly upon recessed speakers. Those speakers are embedded on Swing's patio, that is private property, and away from the street.

You have previously been provided with their statements as voluntary disclosures, and at trial you can anticipate they will testify under oath as to their observations.

Subsequent to your email of April 10, 2025, I investigated further and found two (2) additional witnesses that will testify to essentially the same facts: that is, you trespassed upon Swing 46 property and applied a device directly to speakers.

The observations of these witnesses suggests that, while trespassing on Swing 46's property, you made attempts at collecting, with what can generously be described as, "tainted evidence."

It is also noteworthy that all of these witnesses will also testify at trial that they observed no one, besides yourself, engaging in this behavior.

In response to your allegations of "targeting," there are now five (5) separate, and additional, witnesses that will testify to refute your allegations of you being selectively targeted. If you include the Swing 46 owner, plaintiff John Akhtar, along with the witness Sarah Hayes, there are now seven (7) individuals that are prepared to testify to the same corroborating evidence.

So I ask you once again, for which I believe is the third time, what evidence do you have that will support your allegations of discriminatory behavior on the part of anyone involved in the case now pending in the U.S. District Court for the Southern District of New York?

Sincerely, Anthony Iannarelli, Attorney for Plaintiffs

Anthony N. Iannarelli Jr.
Attorney at Law
201-236-1838
212-431-1031
anilaw2@gmail.com

Eric Eisenberg <ericeis@gmail.com>

Sun, Apr 13, 2025 at 1:24 PM

To: Anthony Iannarelli <anilaw2@gmail.com>

Cc: Eric Eisenberg <ericnoise@hotmail.com>

Anthony,

Stop peddling lies please. You know full well that you have failed to investigate these ridiculous, impossible allegations about touching speakers, and have targeted me and not non-Jew(s) similarly situated. You have adamantly refused to even take a look at the physical premises and how impossible that is, because you are a bigot and an insistent liar. You are acting out of pure malice and hate, and horrendous anti-Jewish discrimination. I plan to bring the appropriate

claim(s) at the appropriate time, most likely against you personally because you appear to be the driving force of the antisemitic targeting and lies.

Your conspiracy to write up falsified documents as part of this nonsense is noted. You have absolutely zero respect for the truth, and absolutely zero ethics.

Additionally, you continue to refuse to tell me whether or not you sent me an email on April 2, 2025. Please indicate yes or no. If yes, please forward me a copy.

Best,
Eric

[Quoted text hidden]

Eric Eisenberg <ericnoise@hotmail.com>

Sun, Apr 13, 2025 at 1:37 PM

To: Eric Eisenberg <ericeis@gmail.com>, Anthony Iannarelli <anilaw2@gmail.com>

At a minimum, please send me a picture of where these "recessed speakers" that you keep referring to are. Your nonsense is completely indecipherable in the absence of this information.

Get Outlook for iOS

From: Eric Eisenberg <ericeis@gmail.com>

Sent: Sunday, April 13, 2025 1:24:09 PM

To: Anthony Iannarelli <anilaw2@gmail.com>

Cc: Eric Eisenberg <ericnoise@hotmail.com>

Subject: Re: April 10, 2025 email Communication

[Quoted text hidden]

Eric Eisenberg <ericeis@gmail.com>

Sun, Apr 13, 2025 at 2:10 PM

To: Eric Eisenberg <ericnoise@hotmail.com>

Cc: Anthony Iannarelli <anilaw2@gmail.com>

I am also going to ask that you stop sending me harassing lies. As you know, I suffer from PTSD, which is a form of anxiety disorder, and your constant gaslighting with ridiculous lies is inflicting significant emotional distress on me.

[Quoted text hidden]